

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

SHORT FORM COMPLAINT

Plaintiff(s) file(s) this *Short Form Complaint and Demand for Jury Trial* against Defendants named below by and through the undersigned counsel. Plaintiff(s) incorporate(s) by reference the specific allegations indicated below of Plaintiffs' *Consolidated Amended Complaint Against the Kingdom of Saudi Arabia and the Saudi High Commission for Relief of Bosnia & Herzegovina and Demand for Jury Trial* in *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 in the United States District Court for the Southern District of New York. Plaintiff(s) file(s) this *Short Form Complaint and Demand for Jury Trial* as permitted and approved by the Court's Order of April ___, 2017, ECF No. _____.

In addition to those causes of action contained in Plaintiffs' Consolidated Amended Complaint against the Kingdom of Saudi Arabia and the Saudi High Commission, where certain claims require specific pleadings and/or amendments, Plaintiff(s) shall add and include them herein.

IDENTIFICATION OF PARTIES¹

1. Plaintiff(s) herein is/are:

INJURY CLAIMS

☐ Plaintiff, the Injured Party, _____ is a resident and citizen of _____.

DEATH CLAIMS

☐ Plaintiff as Administrator/Personal Representative/Executor/Other of The Estate of _____, deceased brings this claim on behalf of the Estate of _____.

☐ Relationship to individual killed on September 11, 2001:

☐ Spouse ☐ Mother ☐ Father

☐ Sister ☐ Brother ☐ Child

☐ Other (*describe relationship*) _____

2. The following entities are made Defendants herein:

☐ Kingdom of Saudi Arabia

☐ Saudi High Commission for Relief of Bosnia & Herzegovina

3. Jurisdiction in this Complaint is based on all defendants in this action:

☐ 28 U.S.C. § 1605(a)(5) (non-commercial tort exception)

☐ 28 U.S.C. § 1605B (Justice Against Sponsors of Terrorism Act)

☐ Other (As set forth below, the basis of any additional ground for jurisdiction must be pled in sufficient detail as required by the applicable Federal Rules of Civil Procedure.)

¹ For multiple plaintiffs, attach a copy of sections 1 – 7 for each plaintiff.

Wrongful Death/Estate

Name of Decedent: _____

Name of Estate Representative: _____

4. Decedent was a resident of _____.

a. Place of death on 9/11:

- | | |
|---|--|
| <input type="checkbox"/> Pentagon | <input type="checkbox"/> AA Flight 77 |
| <input type="checkbox"/> WTC One | <input type="checkbox"/> AA Flight 11 |
| <input type="checkbox"/> WTC Two | <input type="checkbox"/> UA Flight 175 |
| <input type="checkbox"/> Pennsylvania | <input type="checkbox"/> UA Flight 93 |
| <input type="checkbox"/> Other (<i>describe location</i>) _____ | |

Personal Injury

5. Injured Party was diagnosed with: _____

a. Approximate Date(s) of and Location at time of injury:

b. Date of Diagnosis: _____

6. Plaintiff/Injured Party has suffered severe and permanent physical and emotional injuries including, but not limited to, the development of _____
as a result of his/her exposure to the World Trade Center Dust.

a. Other injury claim (describe): _____

7. As a direct, proximate and foreseeable result of Defendants' actions or inactions, Plaintiff suffered grievous bodily injury and consequently economic and other losses, including but not limited to pain and suffering, emotional distress and loss of enjoyment of life, as described in detail in Plaintiffs' *Consolidated Amended Complaint Against the Kingdom of Saudi Arabia and the Saudi High Commission and Demand for Jury Trial*.

CAUSES OF ACTION

9. Plaintiff(s) hereby adopt(s) and incorporate(s) by reference, the *Consolidated Amended Complaint Against the Kingdom of Saudi Arabia and the Saudi High Commission and Demand for Jury Trial* as if set forth fully herein.

10. Furthermore, the following claims and allegations are asserted by Plaintiff(s) and are herein adopted by reference from Plaintiffs' *Consolidated Amended Complaint*:

- ☐ Aiding and Abetting and Conspiring with al Qaeda to Commit the September 11th Attacks Upon the United States in Violation of 18 U.S.C. § 2333(d) (JASTA)
- ☐ Aiding and Abetting and Conspiring with al Qaeda to Commit the September 11th Attacks Upon the United States in Violation of 18 U.S.C. § 2333(a)
- ☐ Committing Acts of International Terrorism in Violation of 18 U.S.C. § 2333
- ☐ Wrongful Death
- ☐ Survival
- ☐ Alien Tort Claims Act
- ☐ Assault and Battery

- ☐ Conspiracy
- ☐ Aiding and Abetting
- ☐ Intentional Infliction of Emotional Distress
- ☐ Liability Pursuant to Restatement (Second) of Torts § 317 and Restatement (Third) of Agency § 7.05: Supervising Employees and Agents
- ☐ Liability Pursuant to Restatement (Second) of Torts § 317 and Restatement (Third) of Agency § 7.05: Hiring, Selecting, and Retaining Employees and Agents
- ☐ 18 U.S.C. § 1962(a)-(d) – CIVIL RICO
- ☐ Trespass
- ☐ Punitive Damages

11. Furthermore, Plaintiff(s) assert(s) the following additional theories and/or Causes of Action against the Defendants identified in Paragraph 2 above: (Additional theories and/or Causes of Action are attached hereto.) _____

WHEREFORE, Plaintiff(s) pray(s) for relief and judgment against Defendants as set forth in the *Consolidated Amended Complaint Against the Kingdom of Saudi Arabia and the Saudi High Commission and Demand for Jury Trial* as appropriate.

JURY DEMAND

Plaintiff(s) hereby demand(s) a trial by jury as to the claims in this action.

Dated: _____

Respectfully Submitted,

Counsel for Plaintiff(s)